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Federal Communications Commission
Office of the Secretary

VIA HAND DELIVERY

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, S.W., Room TW-A325
Washington, D.C. 20554

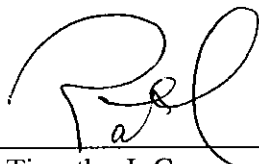
Re: SUPPLEMENT TO PETITION FOR RULEMAKING
***In re* Amendment of Section 73.622(i), Post-Transition DTV Table of Allotments**
(La Crosse, Wisconsin) (File No. BPRM-20080620AOE)

Dear Ms. Dortch:

WXOW-WQOW Television, Inc. ("WXOW-WQOW"), the licensee of WXOW-TV, analog Channel 19, and the permittee of post-transition digital Channel 14, La Crosse, Wisconsin (FIN 64549), by its attorneys, hereby submits the attached Supplemental Engineering Exhibit to supplement its Petition for Rulemaking seeking the amendment of the Post-Transition DTV Table of Allotments, 47 C.F.R. §73.622(i), to substitute DTV Channel 48 as the post-transition DTV allocation for WXOW-DT at La Crosse, Wisconsin. The purpose of the supplement is to respond to a request from Commission staff.

Any questions concerning the instant filing should be directed to the undersigned.

WILKINSON BARKER KNAUER, LLP

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**SUPPLEMENTAL ENGINEERING EXHIBIT
RE: RULEMAKING PETITION BPRM-20080620AOE**

INTRODUCTION

This statement was prepared on behalf of WXOW-WQOW Television, Inc., ("WXOW-WQOW"), licensee of WXOW-TV, analog Channel 19, and the permittee of WXOW-DT, pretransition digital Channel 14, La Crosse, Wisconsin (FIN 64549). It provides a showing of the DTV service area that has been proposed in connection with the petition for rulemaking filed by WXOW-WQOW to amend the DTV Table to substitute Channel 48 for Channel 14 at La Crosse, Wisconsin, as the post-transition DTV channel assigned to WXOW-DT.

WXOW-WQOW submits this supplement in response to a Commission staff inquiry pertaining to the continuation of coverage to viewers currently receiving both analog and digital television service from the existing analog and digital operations of WXOW.

CONTINUITY OF EXISTING SERVICE

The facilities originally approved for post-transition operation on Channel 14 for WXOW-DT in Appendix B were established based on a previous maximization permit that involved a side mount antenna installation. That initial permit was modified by BMPCDT-20060608AAJ to reflect a top-mount antenna with operating parameters equivalent to those previously authorized. Since WXOW-DT could not construct full DTV facilities without removing the top-mounted antenna of its associated analog operation and disrupting existing analog service, the station's digital build-out deadline has been extended to February 17, 2009. The DTV facilities specified in the pending rulemaking petition for post-transition operation on Channel 48 are essentially the same as those facilities authorized in both Appendix B and the outstanding permit as demonstrated below in Table 1:

Table 1

FCC Authorization	DTV Channel	ERP (kW)	HAAT (m)	Latitude	Longitude	41 dBu F(50,90) in km
Appendix B	14	250	327	434823	912202	87.8
BMPCDT-20060608AAJ	14	174	348	434823	912202	87.3
BPRM-20080620AOE	48	200	348	434823	912202	88.3

As stated in the initial engineering exhibit to petition for rulemaking, WXOW-DT is currently providing digital service to 100% of its associated analog service population operating at reduced facilities on Channel 14 under special temporary authority. The facilities requested on Channel 48 will not result in any loss of existing analog or digital service as indicated in Table 2. In fact, the substitution of Channel 48 as proposed in BPRM-20080620AOE results in overall superior coverage.

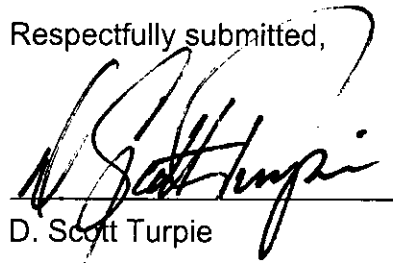
Table 2

FCC Authorization	Channel	ERP (kW)	HAAT (m)	Latitude	Longitude	Service Pop.	Area (sq.km)
BLCT-20010403	19	631	347	434823	912202	293584	13918.2
BMDSTA-20040402ADC	14	49	331.7	434823	912202	332497	17670.6
BPRM-20080620AOE	48	200	348	434823	912202	386044	22379.1

Service population and area estimates listed above in Table 2 for digital Channels 14 and 48 were calculated using the OET 69 prediction methodology. Existing analog service on Channel 19 is shown as previously reported in FCC Public Notice DA 04-3922, Table I. Attached as Figure 1 is a contour map depicting the location of the Noise Limited service contour based on the precise parameters specified for post-transition operation on Channel 48 in the pending rulemaking petition. Figure 1 further illustrates that the proposed service contour completely encompasses the Grade B and Noise Limited service contours of the

existing analog and digital operations. Since WXOW-WQOW intends to transition its existing analog service to digital on Channel 48, it is clearly evident by the coverage comparison shown in Figure 1 that the areas currently receiving an analog or digital signal will not lose service as a result of the proposed channel substitution.

Respectfully submitted,



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